

FILED
8/20/2024
JXM
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Whiteamire Clinic P.A., Inc.,)
)
Plaintiff,)
)
v.) No.: 1:24-cv-06753
)
Cartridge World North America, LLC,)
)
Defendants.)

NOTICE OF THIRD-PARTY CITATION TO DISCOVER ASSETS

Name of Case:	Whiteamire Clinic P.A., Inc. v. Cartridge World North America, LLC
Last Known Addresses of Judgment Debtor and Attorney for Judgment Debtor:	Cartridge World North America, LLC 3917 Mercy Drive, McHenry, IL 60050 Jeffrey Monberg, jeff.monberg@quarles.com, D. 312-715-5162
Names and address of Attorney for Judgment Creditor:	Ross M. Good, Esq. The Good Law Group 800 E. Northwest Hwy, Suite 814 Palatine, IL 60074 direct: (847) 600-9576 ross@thegoodlawgroup.com
Amount of Judgment:	\$ 4,293,000 + 28 U.S.C. § 1961 interest
Name of Person Receiving Citation:	JIREH ENTERPRISES, INC. d/b/a CARTRIDGE WORLD ("KOKOMO") 2380 W. 1100 S., Fairmount, IN, 46928, USA
Return Date and Time:	September 26, 2024 at 9:30 a.m.
Location:	219 South Dearborn Street, Chicago, IL 60604 -Courtroom:1419

NOTICE: The court has issued a citation against the person(s) named above. The citation directs that person(s) to appear in court to be examined for the purpose of allowing the judgment creditor to discover income and assets belonging to the judgment debtor or in which the judgment debtor has an interest. The citation(s) was/were issued on the basis of a judgment against the judgment debtor in favor of the judgment creditor in the amount stated above. On or after the court date stated above, the court may compel the application of any discovered income or assets toward payment on the judgment.

The amount of income or assets that may be applied toward the judgment is limited by federal and Illinois law. The JUDGMENT DEBTOR HAS THE RIGHT TO ASSERT STATUTORY

EXEMPTIONS AGAINST CERTAIN INCOME OR ASSETS OF THE JUDGMENT DEBTOR WHICH MAY NOT BE USED TO SATISFY THE JUDGMENT IN THE AMOUNT STATED ABOVE:

(1) Under Illinois or federal law, the exemptions of personal property owned by the debtor include the debtor's equity interest, not to exceed \$4,000 in value, in any personal property as chosen by the debtor; Social Security and SSI benefits; public assistance benefits; unemployment compensation benefits; worker's compensation benefits; veteran's benefits; circuit breaker property tax relief benefits; the debtor's equity interest, not to exceed \$2,400 in value, in any one motor vehicle, and the debtor's equity interest, not to exceed \$1,500 in value, in any implements, professional books, or tools of the trade of the debtor.

(2) Under Illinois law, every person is entitled to an estate in homestead, when it is owned and occupied as a residence, to the extent in value of \$15,000, which homestead is exempt from judgment.

(3) Under Illinois law, the amount of wages that may be applied toward a judgment is limited to the lesser of (i) 15% of gross weekly wages or (ii) the amount by which disposable earnings for a week exceed the total of 45 times the federal minimum hourly wage or, under a wage deduction summons served on or after January 1, 2006, the Illinois minimum hourly wage, whichever is greater.

(4) Under federal law, the amount of wages that may be applied toward a judgment is limited to the lesser of (i) 25% of disposable earnings for a week or (ii) the amount by which disposable earnings for a week exceed 30 times the federal minimum hourly wage.

(5) Pension and retirement benefits and refunds may be claimed as exempt under Illinois law. The judgment debtor may have other possible exemptions under the law.

THE JUDGMENT DEBTOR HAS THE RIGHT AT THE CITATION HEARING TO DECLARE EXEMPT CERTAIN INCOME OR ASSETS OR BOTH. The judgment debtor also has the right to seek a declaration at an earlier date, by notifying the clerk in writing at 219 South Dearborn Street, Chicago, Illinois 60604. When so notified, the Clerk of the Court will provide a hearing date and the necessary forms that must be prepared by the judgment debtor or the attorney for the judgment debtor and sent to the judgment creditor regarding the time and location of the hearing. This notice may be sent by regular first-class mail.

Respectfully Submitted,
Whiteamire Clinic P.A., Inc.
Plaintiff,

/s/Ross M. Good
One of Plaintiff's Attorneys

Ross M. Good, Esq.
The Good Law Group
800 E. Northwest Hwy, Suite 814
Palatine, IL 60074
direct: (847) 600-9576
ross@thegoodlawgroup.com
Dated: August 19, 2024

CERTIFICATE OF MAILING CITATION

I, Ross Good, an attorney, hereby certify that (i) within three (3) business days of service of the Citation to Discover Assets upon the entities identified above, I served upon Cartridge World North America, LLC, the Judgment Debtor, and his attorney, a copy of the Citation to Discover Assets of a Third Party and the Citation Notice(s) via email and by prepaid certified United States Mail, to the following addresses:

Cartridge World North America, LLC
3917 Mercy Drive
McHenry, IL 60050

Cartridge World North America, LLC
c/o C T CORPORATION SYSTEM
701 S CARSON ST, STE 200
Carson City, NV, 89701

Jeffrey Monberg, jeff.monberg@quarles.com
Quarles & Brady LLP
300 N. LaSalle Street, Suite 4000
Chicago, IL 60654-3406

and (ii) on August 19, 2024, I initiated service on the entities identified above at the addresses identified above, with a copy of the Citation to Discover Assets via Certified Process Server.

Dated: August 19, 2024

/s/Ross M. Good

Ross M. Good, Esq.
The Good Law Group
800 E. Northwest Hwy, Suite 814
Palatine, IL 60074
direct: (847) 600-9576
ross@thegoodlawgroup.com
Dated: August 19, 2024